



COMMODITY SUPPLEMENTAL FOOD PROGRAM  
POLICY AND PROCEDURE MANUAL

## **Chapter 6**

# **Evaluation, Training and Technical Assistance**

Chapter 6	Management Evaluation .....	6.1
	Training and Technical Assistance .....	6.2
	Attachment 6.1 – Monitoring Review – CSFP Contract Agencies	



## COMMODITY SUPPLEMENTAL FOOD PROGRAM

### POLICY AND PROCEDURE MANUAL

SUBJECT:	Management Evaluation	Chapter:	6
		Section:	6.1
REFERENCES:	7 CFR 247	Page:	1 of 1
		Revised:	8-12-04

**PURPOSE:** To outline the management evaluation process the State will use with Commodity Supplemental Food Program contractors.

**POLICY:** Each local agency that contracts with the Missouri Department of Health and Senior Services will be monitored for compliance with Program regulations.

#### PROCEDURES:

- A. On-going monitoring is conducted by reviewing monthly reports, inventories, and status reports.
- B. At least annually, the State conducts a monitoring visit with CSFP contractors to review financial and property management, records and reports, commodity receipt, storage and distribution, certification procedures and documentation (including visits to distribution sites), nutrition education, outreach, referral, civil rights, and fair hearings.
- C. Monitoring activities are documented on CACFP Form 304 Monitoring Review – CSFP Contract Agencies (Attachment 6.1).
- D. The number of distribution and certification sites to be visited is 15% of all sites under the jurisdiction of the local agency, or 10 sites, which ever is less. Copies of page 6 of Attachment 6.1 are completed for each site visited. At each site, 25% of participant records or 25 records, whichever is less, will be reviewed.
- E. Areas of non-compliance will be noted and reviewed with the local agency representative. Within 30 calendar days of the review, a written report will be issued to the local agency.
- F. The local agency is required to follow-up any area of non-compliance with a written corrective action plan. The monitor reviews the corrective action plan to assure that the plan is feasible and complete. When appropriate, a closeout letter is sent to the local agency.
- G. If significant problems exist and or appropriate corrective actions are not taken, the local agency may be in non-compliance with the contract agreement between the SA and LA. Failure to comply with federal regulation and the contract scope of work could result in termination of the contract and from the CSFP.



## COMMODITY SUPPLEMENTAL FOOD PROGRAM

### POLICY AND PROCEDURE MANUAL

SUBJECT:	Training and Technical Assistance	Chapter:	6
		Section:	6.2
REFERENCES:	7 CFR 247, SOW paragraph 3.1.1.5	Page:	1 of 1
		Revised:	8-2-04

**PURPOSE:** To outline the training, technical assistance and evaluation activities required of local agencies participating in the Commodity Supplemental Food Program.

**POLICY:** All local agency staff, volunteers and sub-agency staff shall receive appropriate training at least annually to assure that issuance of supplemental food is in accordance with FNS food package instructions and Program regulations. There shall be an evaluation component of such training and a mechanism for trainees to provide input.

#### PROCEDURES:

- A. Local agencies must implement a process for training and evaluation of all staff and volunteers involved in the CSFP. Training should be appropriate to the degree and frequency of an individual's involvement in the CSFP. For instance, the training and evaluation needs are different for the staff members who deal with the program on a daily basis, than for the distribution site staff and volunteers who might only be involved a few days a month, or for the volunteers who might only be involved once to help assemble food packages.
- B. The State provides technical assistance for local agency staff upon request. Annual seminars and teleconferences are provided for periodic updates. Resources and links are available at <http://www.dhss.mo.gov/csfp/>.



MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES  
DIVISION OF COMMUNITY HEALTH  
COMMUNITY FOOD AND NUTRITION ASSISTANCE  
COMMODITY SUPPLEMENTAL FOOD PROGRAM  
**MONITORING REVIEW – CSFP CONTRACT AGENCIES**

Attachment 6.1

SECTION I. GENERAL INFORMATION					
INSTITUTION NAME		CONTRACT NUMBER			
ADDRESS		DATE			
CONTACT PERSON		NUMBER OF FOOD STORAGE SITES UNDER JURISDICTION			
NUMBER OF DISTRIBUTION SITES UNDER JURISDICTION		NUMBER OF CERTIFICATION ONLY SITES UNDER JURISDICTION			
SECTION II. FINANCIAL MANAGEMENT (8.1, 8.2 & 247.9)* AND RECORDS (8.3 & 247.13)*					
1.	Are the following items on file at the local non-profit contract agency	YES	NO	N/A	COMMENTS
a.	Contract with MDHSS-CFNA.				
b.	Copy of application and application materials.				
c.	Copy of Policy and Procedure Manual.				
d.	Copies of Record of Expenditures and Administrative Claims.				
e.	Copies of agreements with all sub-distributing, certification, and food storage sites.				
f.	Copies of FNS-53, USDA Multifood Requisitions, receiving documents and FNS-57, Report of Shipment Received Over, Short and/or Damaged.				
g.	Copies of FNS-153, Monthly Report of the CSFP and Quarterly Administrative Financial Status Report.				
2.	Is there a system in place to retain all records with respect to the Program for a period of 3 years following the end of applicable federal fiscal year?				
3.	Are records maintained to support the Record of Expenditures and Administrative Claim?				
4.	Is there an equipment inventory maintained for items purchased with CSFP funds?				
5.	Does the contractor compare actual expenditures to approved budget on an on-going basis?				
6.	Has the contractor submitted to MDHSS copies of agreements (1.e. above) and the equipment inventory (4. above).				

\* Numbers from 1.1 through 12.2 refer to the Missouri CSFP Policy and Procedure Manual. Numbers from 247 through 250 refer to Parts within the Code of Federal Regulations, 7 CFR Chapter II.

ITEM	AMOUNT CLAIMED	REVIEWED VERIFIED
SALARIES AND FRINGE BENEFITS (Staff time documented? (SOW 3.4.3.3))		
TELEPHONE		
POSTAGE		
PRINTING		
OFFICE SUPPLIES (LIST)		
EQUIPMENT (LIST): PRIOR APPROVAL REQUIRED (Software > \$300 or Equipment > \$1,000)		
TRAVEL (STAFF TRAVEL)		
TRANSPORTATION COSTS		
SPACE AND FACILITIES		
OTHER COSTS (LIST)		
TOTAL DIRECT COSTS		
INDIRECT COSTS (MAY NOT EXCEED 8% OF DIRECT COSTS)		
GRAND TOTAL ALL COSTS		

### SECTION III. RECEIPT, STORAGE AND DISTRIBUTION OF COMMODITIES (5.1-5.5, 247.4 & 250B)

	YES	NO	N/A	COMMENTS
1. Are adequate personnel and facilities available for the receipt, storage and distribution of CSFP Commodities?				
2. Is food organized in a manner to allow an accurate physical inventory count?				
a. Are the contents of assembled food packages included in the physical inventory count?				
b. Are the contents of undistributed food packages located at remote sites included in the physical inventory count?				
3. Is food stored on pallets, four inches from the wall?				
4. Is the warehouse kept clean and secure?				
5. Is the temperature kept at a level to assure retention of food quality?				
6. Is there a system in place to assure first-in, first-out?				
7. Are FNS-57, Report of Shipment Received Over, Short and/or Damaged completed when required?				
8. Are losses due to food demonstrations supported with participant sign-in log sheets?				

**SECTION IV. CERTIFICATION (2.1-2.10 & 247.7) AND NUTRITION EDUCATION (4.1 & 247.8)**

(See Participant Review Worksheet)

	YES	NO	N/A	COMMENTS
7. Do sub-contractors certify each applicant prior to the issuance of program benefits?				
8. Do sub-contractors maintain a waiting list of individuals who apply for the Program on-site when funding is not available to provide Program benefit?				
9. Do sub-contractors make notifications and referrals in accordance with Program policies and procedures?				
10. Is nutrition education thoroughly integrated into Program operations?				
11. Are Supplemental Foods used for food demonstrations documented on the FNS 153 and supported with participant sign-in log sheets?				

**SECTION V. GENERAL ADMINISTRATION AND TECHNICAL ASSISTANCE (3.1-3.4, 6.1-6.2, 8.3, & 12.1)**

1. Forms used by the contractor collect all required data in an efficient, effective manner.				
2. Contractor has an effective method for monitoring program records and providing feedback for noncompliance issues.				
3. Contractor has an effective method for managing caseload assignments to sub-contractors.				
4. Contractor has a procedure in place to notify sub-contractors of the contractor's policies and procedures.				
5. Contractor has adequate supervisory and operational personnel for effective management and monitoring.				
6. Training provided to sub-contractors under jurisdiction is provided in accordance to the management plan. Training was directly related to CSFP issues. Training is provided at least annually.				
7. Contractor has a system in place to:				
b. Evaluate the training needs of the subcontractors.				
c. Evaluate the training provided.				
d. Document date, location, topics, and names of participants.				
8. Does contractor provide technical assistance materials to sub-contractors such as newsletters, brochures, etc.? Is information accurate?				
9. Contractor has assigned a hearing officer and is prepared to conduct fair hearings if requested.				

**SECTION VI. CORRECTIVE ACTIONS**

1. Date of last monitoring.	2. Date of last organizational wide audit (OWA).	3. Was copy of OWA forwarded to MDHSS? <input type="checkbox"/> Yes <input type="checkbox"/> No
-----------------------------	--	--

4. Major findings from last monitoring visit.

5. Have findings been corrected?    ☐ Yes    ☐ No

If not, what problems continue?

**SECTION VII. CIVIL RIGHTS (11.1 & 247.19)**

FNS Instructions 113-2, Rev. 1. Indicate the racial/ethnic makeup of the enrollment at the time of this review:  
(Report actual number of participant)

American Indian or Alaska Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	White
Within the above racial categories, indicate how many are of Hispanic or Latino ethnicity.				

	YES	NO	N/A
1. Do admission procedures restrict enrollment by minority persons?			
2. Do all materials used to publicize the CSFP to participants and the public contains the nondiscrimination statement and procedure for filing a complaint? (Attach copies.)			
3. Is the Civil Rights statement displayed?			
4. Is data on file to document the number of potential eligible participants for the geographic area served by the contractor by racial/ethnic category?			
5. Is the institution providing program information and compliance procedures on request in the appropriate translation?			
6. Are all services and facilities accessible and used routinely by all persons without regard to race, color, national origin, sex, or disability?			
7. Were there any verbal or written complaints of discrimination prior to this review?			
8. In the opinion of the reviewer, based on information contained in this review and personal observation, does the institution appear to be in compliance with Title VI of the Civil Rights Act of 1964? (If no, indicate on a separate sheet, 1) What the areas of noncompliance are, and 2) Recommendations for corrective action and follow-up.)			

**SECTION VIII. EXIT CONFERENCE**

1. Findings

2. Comments and/or Suggestions

3. Recommendations

**PROGRAM REVIEWED BY**

CSFP CONSULTANT

DATE

**THIS REVIEW WAS DISCUSSED WITH**

SIGNATURE



TITLE

DATE



# DISTRIBUTION AND CERTIFICATION SITE VISIT WORKSHEET

GENERAL INFORMATION				
AGENCY NAME:	DATE:			
ADDRESS:	NUMBER OF FOOD PACKAGES DISTRIBUTED LAST MONTH			
CERTIFICATION PROCESS	YES	NO	N/A	COMMENTS
Do applications contain identifying information for each participant?				
Do applications contain dates-of-birth?				
Do applications contain SSN and household income information?				
Have applicants signed and dated the forms?				
Has the agency documented				
Proof of age/eligibility				
Residency				
Health and social services referral				
Has the certifier signed and entered his/her title on all forms?				
Is eligibility determination identified?				
Are categories correctly identified?				
Are dates of certification documented?				
Is there 20 days or less between date of application and determination of eligibility?				
If certification requests were denied, are applications kept on file?				
If waiting list maintained, is priority correctly assigned?				
DUAL PARTICIPATION				
Are all category PG, PP, BF, INF and CH reported on the Dual Participation Roster?				
NOTIFICATION REQUIREMENTS				
For persons found to be ineligible during the certification period, is there documentation of verbal or written notification of reasons and appeal rights at least 15 days in advance of termination.				
Is there documentation of verbal or written notification at least 15 days in advance of the expiration of the most recent certification periods?				
CERTIFICATION PERIODS				
Pregnant-for duration of pregnancy plus 6 weeks.				
Elderly, other women, children and infants – 6 months.				
NUTRITION EDUCATION				
Is the agency prepared nutrition education distributed effectively?				
If food demonstrations offered, is there documentation of attendees?				
FOOD DELIVERY				
Is there documentation of the quantities and types of food issued and for undistributed food packages?				
Are participants or proxy signatures and dates available verifying receipt of food each time it is issued?				
Are proxy authorizations available for all proxies used?				

**PARTICIPANT REVIEW WORKSHEET**

REVIEW 25% OF FOOD PACKAGES DISTRIBUTED LAST MONTH OR 25 WHICH EVER IS LESS.  
ANNOTATE PROBLEMS. CHECK OR "X" IF NO PROBLEM NOTED.

PARTICIPANT NAME	INFORMATION MISSING	RECERTIFICATION OVER DUE	OTHER
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			
25			